

## **EXHIBIT 7**



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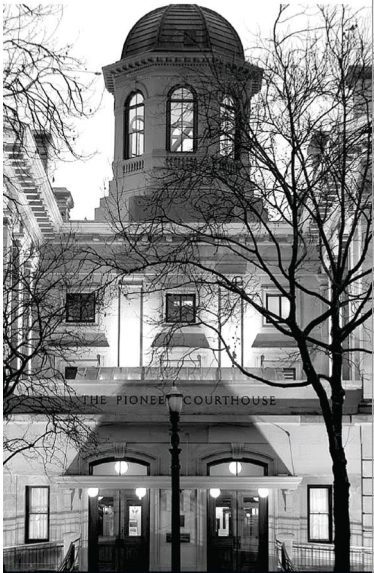
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**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROY STEWART MOORE, et al

Plaintiffs,

v.

Index No. 19 Civ. 4977 (ALC)

SACHA BARON COHEN, et al

Defendants.

**CONFIDENTIAL**

**REMOTE VIDEO DEPOSITION BY VIDEOCONFERENCE**

**SACHA NOAM BARON COHEN**

**TAKEN ON  
WEDNESDAY, JANUARY 13, 2021  
2:01 P.M.**

**LOS ANGELES, CALIFORNIA**

**APPEARANCES****Appearing on behalf of the Plaintiff:**

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**Also Present:**

Roy Moore, Plaintiff

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Page

EXAMINATION BY MR. KLAYMAN

10

1 CERTIFIED QUESTIONS

2

3 PAGE 11, LINE 3:

4 Q. In fact, in your show "Who Is America?" you  
5 deceived people to come on the show including my client,  
6 Moore.

7

8 PAGE 28 LINE 3:

9 Q. So someone else came -- are you saying  
10 else came up with the concept first?

11

12 PAGE 36 LINE 1:

13 Q. That's the character that you've used in  
14 America?"; correct? When you interviewed persons, you  
15 in disguise; correct?

16

17 PAGE 40 LINE 17:

18 Q. The reason that you had all of these companies  
19 that we've listed, that you own them, is to insulate  
20 yourself from personal liability; correct?

21

22 PAGE 51 LINE 25

23 Q. What -- what did Yerushalayim TV do to reach  
24 Hasidic community when it was in existence?

25

## EXHIBITS

Exhibit

Page

1 CONSENT AGREEMENT

13

2 DEFENDANTS PRODUCED DOCUMENTS

45



1 **CONFIDENTIAL**

2 **REMOTE VIDEO DEPOSITION BY VIDEOCONFERENCE**

3 **SACHA NOAM BARON COHEN**

4 **TAKEN ON**

5 **WEDNESDAY, JANUARY 13, 2021**

6 **2:01 P.M.**

7  
8 **THE VIDEOGRAPHER:** We are on the record.

9 The time is 2:01 p.m. The date is January 13th,  
10 2021. This is the beginning of the deposition of  
11 Sacha Baron Cohen. The case caption is Roy Moore  
12 vs. Sacha Baron Cohen. Will counsel introduce  
13 yourselves and state whom you represent.

14 **MR. KLAYMAN:** Larry Klayman for the  
15 plaintiffs, Chief Justice Roy Moore and Kayla Moore,  
16 his wife. And with me is Melissa Isaak. She may  
17 introduce herself too. She is of counsel to me and  
18 also counsel to Chief Justice Roy Moore and Kayla  
19 Moore.

20 **MS. MCNAMARA:** I'm Elizabeth McNamara of  
21 Davis Wright Tremaine representing all the  
22 defendants in this action including the witness.  
23 And I have with me my colleague Eric Feder and also  
24 Russell Smith who is an individual attorney for Mr.  
25 Baron Cohen.

1           **MR. KLAYMAN:** I just want to put on the  
2 record right now that if there are any objections,  
3 that -- that should not count to our time of one  
4 hour. I don't know if there will be any objections,  
5 but that's our position in that regard. Is that  
6 agreeable, Ms. McNamara?

7           **MS. MCNAMARA:** I don't think that is a  
8 normal course for a deposition. Hopefully, there --  
9 you will not cause the need of -- of -- of wordy  
10 objections. I will endeavor to make my objections  
11 very concise, so it should not interfere with the  
12 time. But I don't think that should be a problem.

13           **MR. KLAYMAN:** And I -- we'll -- we'll see  
14 how it goes. If necessary, I'll have to ask for  
15 more time with the Court. I would hope that we would  
16 also not make speaking objections, which is not  
17 proper under litigation practice. I would ask you  
18 not to do that. Okay?

19           **THE VIDEOGRAPHER:** Okay. The court  
20 reporter will now swear in the witness.

21           **THE REPORTER:** Thank you. Mr. Baron  
22 Cohen, can I please have you raise your right hand,  
23 sir.

24           **THE DEPONENT:** Yes.

25           **THE REPORTER:** Thank you. Do you solemnly

1 swear or affirm under the penalty of perjury that  
2 you are Sacha Baron Cohen, and that the testimony  
3 you're about to provide will be the truth, the whole  
4 truth, and nothing but the truth?

5 **THE DEPONENT:** I do.

6 **THE REPORTER:** Thank you.

7 **SACHA NOAM BARON COHEN**, having been duly sworn, was  
8 examined, and testified as follows:

9 **EXAMINATION**

10 **BY MR. KLAYMAN:**

11 **Q. Please state your name. Please state your**  
12 **full name.**

13 **A.** I am Sacha Noam Baron Cohen.

14 **Q. How is Noam spelled?**

15 **A.** N for nobody, O for orange, A for anybody,  
16 M for mother.

17 **Q. You are aware that you're under oath. Are**  
18 **-- are you not Mr. Sacha Baron Cohen?**

19 **A.** Yes, I am.

20 **Q. Have you ever been deposed before?**

21 **A.** I do not recall that I have been.

22 **Q. Have you ever testified in a trial in**  
23 **court?**

24 **A.** Only on screen in a movie representation  
25 of a courtroom.

1 have done over the last 20 or so years has been a  
2 group effort -- not only a team of writers and  
3 producers, but to actually enact it, we have a team  
4 of excellent lawyers and business managers,  
5 accountants, and, obviously, the crew. And --

6 **BY MR. KLAYMAN:**

7 **Q. So someone else came -- are you saying**  
8 **someone else came up with the concept first?**

9 A. That is not what I said.

10 **MR. KLAYMAN:** Certify this. We didn't get  
11 a response.

12 **BY MR. KLAYMAN:**

13 **Q. Now, you are the owner of La Quinta**  
14 **Entertainment, LLC; correct? Sole owner.**

15 A. Yes, I am. To my knowledge.

16 **Q. You are the sole owner of Please You Can**  
17 **Touch Me, LLC; correct? Or Please You Can Touch,**  
18 **LLC.**

19 A. For the record, it's "Please You Can  
20 Touch."

21 **Q. Yes.**

22 A. Not "Please You Can Touch Me."

23 **Q. And you are the sole owner.**

24 A. Yes, I am.

25 **Q. And you are the sole owner of Greenpark**

1 **Television?**

2 A. Yes, I believe I am.

3 **Q. And you were the sole owner, while it was**  
4 **in existence, of Yerushalayim TV; correct?**

5 A. Yes. That is correct.

6 **Q. And you are the sole -- sole owner of**  
7 **Front Line Strategies; correct?**

8 A. I have never heard of that company.

9 **Q. Okay. Now, turning back to the Agreement,**  
10 **Exhibit 1, Bates Number 17.**

11 A. What -- what -- what is -- what is -- if  
12 you don't mind me asking, what is -- I know that you  
13 are the lawyer, so what is Front Line Strategies? I  
14 -- I'm not aware of the existence of that.

15 **Q. We'll -- we'll get to that. We'll get to**  
16 **that. Turning back to Exhibit 1, Bates Number 17,**  
17 **paragraph 1, "The participant agrees to be filmed**  
18 **and audiotaped by the producer for a reality-style**  
19 **television series. It is understood that the**  
20 **producer hopes to reach a young adult audience by**  
21 **using entertainment content and format." Now,**  
22 **looking down at the bottom of the Agreement, which**  
23 **is signed by Yerushalayim TV, it does not say that**  
24 **Yerushalayim TV is the producer; does it?**

25 **MS. MCNAMARA:** Objection. I -- I instruct